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Attorneys for  
 Teichert Pipelines, Inc. and A. Teichert & Sons, Inc.  
 d/b/a Teichert Aggregates

UNITED STATES BANKRUPTCY COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

and

PACIFIC GAS AND ELECTRIC COMPANY,  
 Debtors.

Case Nos.:

19-30088 (DM) – Lead Case  
 19-30089 (DM)

Chapter 11 Case

**NOTICE OF CONTINUED  
 PERFECTION OF MECHANICS  
 LIEN PURSUANT TO 11 U.S.C. §  
 546(b)(2)**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affect both Debtors

TEICHERT PIPELINES, Inc. ("TEICHERT"), by and through its undersigned counsel, hereby gives notice of continued perfection of its mechanics lien under 11 U.S.C. § 546(b)(2), as follows:

1. TEICHERT is a corporation that has provided and delivered labor, services, equipment, and/or materials for a work of improvement located in the County of Marin, State of California (the "Property") and owned by PG&E Corporation and/or Pacific Gas

1 and Electric Company (collectively, the "Debtors").

2 2. Through April 17, 2019, the amount owing to TEICHERT is at least  
3 \$1,247,229.13, exclusive of accruing interest and other charges, with additional amounts  
4 owed and accrued after April 17, 2019.

5 3. Teichert properly perfected its mechanics lien under California Civil Code §§  
6 8400, *et seq.* by timely recording its Mechanics Lien (Claim of Lien) in the Official Records  
7 of Marin County, State of California, as more fully described in its Mechanics Lien, a true  
8 copy of which is attached hereto as Exhibit A, on or about April 19, 2019.

9 4. Pursuant to California Civil Code § 8460, an action to enforce a lien must be  
10 commenced within 90 days after recordation of the claim of lien. However, due to the  
11 automatic stay set forth in 11 U.S.C. § 362, TEICHERT is precluded from filing a state court  
12 action to enforce its mechanics lien. 11 U.S.C. § 546(b)(2) provides that when applicable law  
13 requires seizure of property or commencement of an action to perfect, maintain, or continue  
14 the perfection of an interest in property, and the property has not been seized or an action has  
15 not been commenced before the bankruptcy petition date, then the claimant shall instead give  
16 notice within the time fixed by law for seizing the property or commencing an action. (See  
17 11 U.S.C. § 546(b)(2); see also In re Baldwin Builders (Village Nurseries v. Gould), 232 B.R.  
18 406, 410-411 (9<sup>th</sup> Cir. 1999); Village Nurseries v. Greenbaum, 101 Cal.App.4<sup>th</sup> 26, 41 (Cal.  
19 Ct. App. 2002).)

20 5. Accordingly, TEICHERT hereby provides notice of its rights as a perfected  
21 lienholder in the Property pursuant to California's mechanics lien law. TEICHERT is filing  
22 and serving this notice to preserve, perfect, maintain, and continue the perfection of its lien  
23 and its rights in the Property to comply with the requirements of California state law, 11  
24 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), and any other applicable law. This notice  
25 constitutes the legal equivalent of having commenced an action to foreclose the lien in the  
26 proper court. By this notice, the Debtors and other parties in interest are estopped from  
27 claiming that the lawsuit to enforce TEICHERT's mechanics lien was not timely commenced  
28 pursuant to applicable state law. TEICHERT intends to enforce its lien rights to the fullest

1 extent permitted by applicable law. The interests perfected, maintained, or continued by  
2 11 U.S.C. § 546(b)(2) extend in and to the proceeds, products, offspring, rents, or profits of  
3 the Property.

4 6. The filing of this notice shall not be construed as an admission that such filing  
5 is required under the Bankruptcy Code, the California mechanics lien law, or any other  
6 applicable law. In addition, TEICHERT does not make any admission of fact or law, and  
7 TEICHERT asserts that its lien is senior to and effective against entities that may have  
8 acquired rights or interests in the Property previously.

9 7. The filing of this notice shall not be deemed to be a waiver of TEICHERT's  
10 right to seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of  
11 any other rights or defenses.

12 8. TEICHERT reserves all rights, including the right to amend or supplement  
13 this notice.

14  
15 DATED: April 26, 2019

DOWNEY BRAND LLP

17 By: /s/ Jamie P. Dreher  
18 JAMIE P. DREHER  
19 Attorney for  
20 TEICHERT PIPELINES, INC. AND  
21 A. TEICHERT & SONS, INC. D/B/A TEICHERT  
22 AGGREGATES  
23  
24  
25  
26  
27  
28

# **EXHIBIT A**

RECORDING REQUESTED BY  
REQUESTED BY SCOTT MCELHERN  
WHEN RECORDED MAIL TO

NAME DOWNEY BRAND LLP  
MAILING Scott McElhern  
ADDRESS 621 Capitol Mall, 18th Floor  
Sacramento, CA 95814

PHONE (916) 444-1000  
NUMBER

SPACE ABOVE THIS LINE FOR RECORDER'S USE ONLY

**CLAIM OF MECHANICS LIEN**  
**(Cal. Civ. Code § 8416)**

1. Teichert Pipelines, Inc. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a Pacific Gas & Electric Company work of improvement located in the County of Marin, State of California, and more particularly described as follows:

Gas distribution main lines and service lines for the locations listed on the attached Exhibit A.

2. After deducting all just credits and offsets, the sum of \$1,247,229.13, plus interest accrued and accruing thereon at the maximum legal rate, is due Claimant for the following generally described labor, materials, services, and/or equipment: repairing or replacing existing gas distribution main and service facilities throughout PG&E's service territory, including prospecting, trenching, shoring, excavating, and off hauling of excess material; hauling import material, backfilling, compacting, compaction testing; hauling and handling of gas pipe, fittings, and appurtenances; placing, aligning, joining, and testing of all gas pipe, fittings, and appurtenances; performing tie-ins and cut-offs to existing PG&E gas facilities; installing and testing cathodic protection facilities.

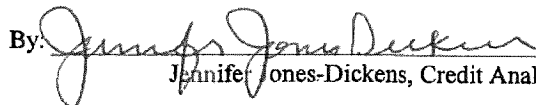
3. Claimant furnished the work and materials at the request of and under contract with Pacific Gas & Electric Company, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

4. The name and address of the owner or reputed owner of the improvements is Pacific Gas & Electric Company, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

5. Claimant's address is: 3500 American River Drive, Sacramento, CA 95864.

DATED: 4/17/19

TEICHERT PIPELINES, INC.

By:   
Jennifer Jones-Dickens, Credit Analyst

### VERIFICATION

I, Jennifer Jones-Dickens, am a Credit Analyst for Teichert Pipelines, Inc., and am authorized to make this verification for and on its behalf. I have read the foregoing claim of mechanics lien and know the contents of the claim of mechanics lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: 4/17/19

TEICHERT PIPELINES, INC.

By:

  
Jennifer Jones-Dickens, Credit Analyst

## EXHIBIT A

Street Location	County
1 East Blithedale. Mill Valley, CA	Marin
1 Birdsnest Ct. Mill Valley, CA	Marin
10 Arboleda Cir. Fairfax, CA	Marin
10 Madera Blvd.. Corte Madera, CA	Marin
10 Sulphur Spa Rd. San Anselmo, CA	Marin
1011 Machin Ave.. Novato, CA	Marin
103 Kin Dr. San Rafael, CA	Marin
108 Cobblestone Ct. Novato, CA	Marin
11 Luzanne Cir. San Anselmo, CA	Marin
111 Smith Ranch Rd. San Rafael, CA	Marin
1118 1st St. Novato, CA	Marin
1127 Magnolia Ave. Larkspur, CA	Marin
115 Rocca Dr. Fairfax, CA	Marin
115 Hidden Valley Ln. San Anselmo, CA	Marin
115 Highland Ln. Mill Valley, CA	Marin
115 Tarry Rd. San Anselmo, CA	Marin
12 California Condor Way Novato, CA	Marin
12 Dominican Dr. San Rafael, CA	Marin
12 Presidio Ave. Apt 1. Mill Valley, CA	Marin
120 Mountain View Ave. San Rafael, CA	Marin
125 Morning Sun Ave. Mill Valley, CA	Marin
13 California Condor Way Novato, CA	Marin
1314 2nd St. San Rafael, CA	Marin
136 Belvedere Dr. Mill Valley, CA	Marin
14 Glen Dr. Mill Valley, CA	Marin
14 Shemran Ct. Fairfax, CA	Marin
140 Richardson Dr. Mill Valley, CA	Marin
141 Walnut Ave. Mill Valley, CA	Marin
1434-1436 Grand. San Rafael, CA	Marin
15 Oak Springs Dr. San Anselmo, CA	Marin
15 Alhambra Cir. Fairfax, CA	Marin
15 Laurel Ave. San Anselmo, CA	Marin
15 Salvador Way San Rafael, CA	Marin
151 Ridgewood Dr. San Rafael, CA	Marin
158 W Blithedale. Mill Valley, CA	Marin
16 Blackhawk Dr. San Anselmo, CA	Marin
16 Stanton Way Mill Valley, CA	Marin
160 Tioga Ln. Kentfield, CA	Marin
162 Bulkey Ave. Sausalito, CA	Marin

17 Woodside Way San Rafael, CA	Marin
1704 Lincoln Ave. San Rafael, CA	Marin
1787 Grant St. Novato, CA	Marin
18 Sylvan Lane. Ross, CA	Marin
180 Marguerite Ave. Mill Valley, CA	Marin
189 The Alameda. San Anselmo, CA	Marin
19 Manor Rd. Fairfax, CA	Marin
190 Park St. San Rafael, CA	Marin
1924 4th St. Lowr. San Rafael, CA	Marin
195 Esmeyer Dr. San Rafael, CA	Marin
2 Fifer Ave. Ste 235. Corte Madera, CA	Marin
2 Upper Alcatraz Pl. Mill Valley, CA	Marin
20 Allyn Ave. San Anselmo, CA	Marin
20 California Condor Way Novato, CA	Marin
20 Dorian Way San Rafael, CA	Marin
2004 Novato Blvd. Novato, CA	Marin
202 Solano St. San Rafael, CA	Marin
204 McNear Dr. San Rafael, CA	Marin
21 Ridgewood Dr. San Rafael, CA	Marin
2104 Redwood Hwy. Greenbrae, CA	Marin
215 Main St. Sausalito, CA	Marin
221 Bayview Dr. San Rafael, CA	Marin
223 Molino Ave. Mill Valley, CA	Marin
224 Riviera Dr. San Rafael, CA	Marin
225 Coleman Dr. San Rafael, CA	Marin
23 Olive Ave. San Rafael, CA	Marin
230 Ridgewood Dr. San Rafael, CA	Marin
230 Sequoia Dr. San Anselmo, CA	Marin
234 Tamalpais Rd. Fairfax, CA	Marin
245 Adobestone Ct. San Rafael, CA	Marin
245 Prospect Dr. San Rafael, CA	Marin
25 California Condor Way Novato, CA	Marin
25 Old Landing Rd. Tiburon, CA	Marin
25 Plaza Dr. Mill Valley, CA	Marin
250 Alta Vista Ave. Mill Valley, CA	Marin
255 Vista Grande. Kentfield, CA	Marin
26 Main St. San Quentin, CA	Marin
2626 Sir Francis Drake Blvd. Fairfax, CA	Marin
27 Marquard Ave. San Rafael, CA	Marin
28 Prairie Falcon Dr. Novato, CA	Marin
28 Coast Oak Way San Rafael, CA	Marin
288 Bolinas Rd. Fairfax, CA	Marin
29 Andreas Cir. Novato, CA	Marin



29 Renz Rd. Mill Valley, CA	Marin
2904 Las Gallinas Ave. San Rafael, CA	Marin
30 Real Dr. Larkspur, CA	Marin
30 Main St. San Quentin Village, CA	Marin
30 Spruce Rd. Fairfax, CA	Marin
300 Vista Grande Kentfield, CA	Marin
32 Bonnie Banks Way San Rafael, CA	Marin
32 Manderly Rd. San Rafael, CA	Marin
32 Manzano Ct. Novato, CA	Marin
32 Peacock Ct. San Rafael, CA	Marin
322 Santa Margarita. San Rafael, CA	Marin
333 Forbes Ave. San Rafael, CA	Marin
340 Woodland Ave. San Rafael, CA	Marin
35 Oak View Dr. San Rafael, CA	Marin
36 Cannyon Rd. San Anselmo, CA	Marin
36 Montevideo Way San Rafael, CA	Marin
36 Woodleaf Ct. Novato, CA	Marin
373 Grandview Ave. Novato, CA	Marin
380 S Morningson Ave. Mill Valley, CA	Marin
388 Orange Blossom Ln. San Rafael, CA	Marin
4 Montevideo Way San Rafael, CA	Marin
40 Glen Dr. Fairfax, CA	Marin
405 Los Cerros Dr. Kentfield, CA	Marin
406 Cascade Dr. Fairfax, CA	Marin
407 Pine St. Mill Valley, CA	Marin
408 Forbes Ave. San Rafael, CA	Marin
419 Laverne Ave. Mill Valley, CA	Marin
42 Rhinestone Ter. San Rafael, CA	Marin
42 Oak Mountain Ct. San Rafael, CA	Marin
42 Summerhill Way San Rafael, CA	Marin
422 Cedar Hill Dr. San Rafael, CA	Marin
433 Estado Way Novato, CA	Marin
433 Oak Manor Dr. Fairfax, CA	Marin
45 Fremont Rd. San Rafael, CA	Marin
45 Tamal Vista Blvd. Corte Madera, CA	Marin
455 Magnolia Ave. Larkspur, CA	Marin
46 Tan Oak Cir. San Rafael, CA	Marin
47 Bolinas Rd. Fairfax, CA	Marin
48 Sea Way San Rafael, CA	Marin
485 Alameda De La Loma Novato, CA	Marin
49 Martling Rd. San Anselmo, CA	Marin
5 Greenfield Ct. San Anselmo, CA	Marin
50 Belvedere Dr. Mill Valley, CA	Marin

515 Sequoia Dr. San Anselmo, CA	Marin
52 Summit Dr. Corte Madera, CA	Marin
53 Canyon Rd. San Anselmo, CA	Marin
535 Jacoby St. San Rafael, CA	Marin
55 Real Dr. Unit 1. Larkspur, CA	Marin
553 San Rafael Ave. Belvedere, CA	Marin
555 Oak Ave. San Anselmo, CA	Marin
56 Rosemont Ave. San Anselmo, CA	Marin
575 Fairway Dr. Novato, CA	Marin
59 Jordan Ave. San Anselmo, CA	Marin
594 Heather Way San Rafael, CA	Marin
6 Sunny Oaks Dr. San Rafael, CA	Marin
60 Dominican Dr. San Rafael, CA	Marin
62 Inverness Dr. San Rafael, CA	Marin
62 Manderly San Rafael, CA	Marin
65 Shell Rd. Mill Valley, CA	Marin
65 Mitchell Blvd. San Rafael, CA	Marin
60 Real Dr. Larkspur, CA	Marin
65 Shell Rd. Mill Valley, CA	Marin
658 Goodhill Rd. Kentfield, CA	Marin
67 Convent Ct. San Rafael, CA	Marin
678 Las Colindas Dr. San Rafael, CA	Marin
7 Felipa Ct. Tiburon, CA	Marin
7 Cedar Ave. Kentfield, CA	Marin
7 Rocca Dr. Fairfax, CA	Marin
7 Roger Dr. San Rafael, CA	Marin
75 Oakdale Ave. San Rafael, CA	Marin
7586 Redwood Blvd Ste D. Novato, CA	Marin
77 Via La Cumbre Larkspur, CA	Marin
79 Woodland Ave. San Rafael, CA	Marin
8 Bradcliff Ct. San Rafael, CA	Marin
8 Westward Dr. Corte Madera, CA	Marin
82 Marina Blvd. San Rafael, CA	Marin
828 Autumn Lane Mill Valley, CA	Marin
83 Woodland Av. San Rafael, CA	Marin
84 Brentwood Dr. San Rafael, CA	Marin
85 Park Dr. San Anselmo, CA	Marin
85 Sycamore Ave. Mill Valley, CA	Marin
9 Diego Dr. San Rafael, CA	Marin
9 Upper Road West Ross, CA	Marin
90 Gate 5 Rd. Sausalito, CA	Marin
90 Marina Vista Ave. Larkspur, CA	Marin
907 Alturas Way Mill Valley, CA	Marin

930 Lovell Ave. Mill Valley, CA  
95 Main St. San Quentin, CA  
97 Santa Rosa Ave. Sausalito, CA  
97 Tamalpais Ave. San Anselmo, CA  
Bollinas & Shady Lane, Ross, CA

Marin  
Marin  
Marin  
Marin  
Marin

## **NOTICE OF MECHANICS LIEN CLAIM**

### **ATTENTION!**

**Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.**

**The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.**

**BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS' STATE LICENSE BOARD WEB SITE AT [www.clb.ca.gov](http://www.clb.ca.gov).**

## PROOF OF SERVICE AFFIDAVIT

I, Mary Dowd declare:

On April 19, 2019, at Sacramento, California, I served the enclosed:

### CLAIM OF MECHANIC'S LIEN

by enclosing true and correct copies thereof in sealed envelopes, with postage thereon fully prepaid, using one of the following described mailing methods:


- ☐ Registered Mail, Return Receipt Requested;
- ☒ Certified Mail, Return Receipt Requested;
- ☐ Express Mail; or
- ☐ Overnight delivery by an express service carrier.

The envelope was addressed as follows:

Pacific Gas & Electric Company  
77 Beale Street, 32nd Floor  
San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signed on April 19, 2019, at Sacramento, California.

  
\_\_\_\_\_  
Mary Dowd